

June 23, 2005

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

**RE: Massachusetts Electric Company and Nantucket Electric Company, D.T.E.
05-2**

Dear Ms. Cottrell:

Enclosed please find the Attorney General's Second Set of Document and Information Requests in the above matter. Thank you.

Sincerely,

Colleen McConnell
Assistant Attorney General

enclosure

cc: John Geary, Hearing Officer
Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Massachusetts Electric Company and
Nantucket Electric Company

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D.T.E. 05-2

ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's First Set of Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Massachusetts Electric Company and/or Nantucket Electric Company (collectively, the "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide 2 copies of all requested documents, even bulk responses. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. If the response contains attachments with confidential material and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.
16. The term "Company" refers to Massachusetts Electric Company and Nantucket Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please submit responses within 10 calendar days of receiving the request, as directed by the Hearing Officer in the Ground Rules.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Massachusetts Electric Company and)	
Nantucket Electric Company)	D.T.E. 05-2
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ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's SECOND SET of DISCOVERY in the above referenced docket.

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| AG-2-1 | Refer to the Company's revised response to DTE-1-1. Please provide a working spreadsheet model that generates the regional index results included in the response. |
| AG-2-2 | Refer to the Company's revised response to DTE-1-1. Please provide copies of the actual tariff documents that are replacements for tariffs supplied to the Attorney General on October 11, 2004 as supporting documentation to the regional index calculation made at that time. |
| AG-2-3 | Refer to the Company's response to AG-1-16. Please explain how the NEPOOL Schedule 1 revenues are derived. What tariff provisions support the recovery of the NEPOOL Schedule 1 charges? Identify what costs are included in the NEPOOL Schedule 1 rates and what customers are billed under the NEPOOL Schedule 1 and explain how the revenues allocated to NEP. |
| AG-2-4 | Refer to the Company's response to AG-1-15. Please provide a copy of NEP's transmission revenue requirements and adjustment to reflect NY border charge elimination (Exhibit CAC-1, Workpaper page 2 of 6) that supports the MECo transmission expense. Include all the cost of service documentation and all supporting workpapers and calculations. The response should provide the complete "Attachment (s) H" referred to in the footnote to the response to AG-1-15. |
| AG-2-5 | Refer to Exhibit CAC-1, page 1 of 3. Please provide a copy of NEP cost of service/revenue requirements supporting the Scheduling and Dispatch charges (Column 3). Include all supporting workpapers and calculations. |

- AG-2-6 Are any costs included in NEP's Non- PTF revenue requirement that are also included in NEP's Scheduling and Dispatch revenue requirement? If yes, please explain why this is not a double recovery. Identify the duplicated costs by FERC account number and sub account and specify the amounts.
- AG-2-7 Are any costs included in NEP's PTF revenue requirement that are also included in NEP's Scheduling and Dispatch revenue requirement? If yes, please explain why this is not a double recovery. Identify the duplicated costs by FERC account number and sub account and specify the amounts.
- AG-2-8 Are any costs included in NEP's Non- PTF revenue requirement that are also included in NEP's PTF revenue requirement? If yes, please explain why this is not a double recovery. Identify the duplicated costs by FERC account number and sub account and specify the amounts.
- AG-2-9 Please provide a copy of the Company's current Transmission Cost Adjustment tariff or provision. If the Company does not have a formal Transmission Cost Adjustment tariff, please explain why and provide a draft tariff that the Company would file if the Department required.

Dated: June 23, 2005

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Massachusetts Electric Company and)	
Nantucket Electric Company)	D.T.E. 05-2
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person on the service list compiled by the Secretary in D.T.E. 05-2. Dated at Boston this 23rd day of June, 2005.

Colleen McConnell
Assistant Attorney General
Office of the Attorney General
Utilities Division
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Boston, MA 02108
(617) 727-2200